

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

VINSON & ELKINS LLP

Steven M. Abramowitz (No. 043641990)
David S. Meyer (admitted *pro hac vice*)
Lauren R. Kanzer (admitted *pro hac vice*)
The Grace Building
1114 Avenue of the Americas, 32nd Floor
New York, New York 10036-7708
Tel: (212) 237-0000
Fax: (212) 237-0100
Email: sabramowitz@velaw.com
dmeyer@velaw.com
lkanzer@velaw.com

-and-

William L. Wallander (admitted *pro hac vice*)
Matthew D. Struble (admitted *pro hac vice*)
2001 Ross Avenue, Suite 3900
Dallas, Texas 75201
Tel: (214) 220-7700
Fax: (214) 220-7716
Email: bwallander@velaw.com
mstruble@velaw.com

Counsel for Ad Hoc Group of Customers of Powin, LLC

In re:

Powin, LLC, *et al.*,¹

Debtors.

Case No. 25 – 16137 (MBK)

Chapter 11

(Jointly Administered)

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin, LLC [0504], (ii) PEOS Holdings, LLC [5476], (iii) Powin Project LLC [1583], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

**CERTIFICATE OF NO OBJECTION
REGARDING MOTION FOR ENTRY OF AN ORDER
AUTHORIZING AD HOC CUSTOMER GROUP TO REDACT
AND FILE UNDER SEAL CONFIDENTIAL INFORMATION
CONTAINED IN EXHIBITS IN CONNECTION WITH AD HOC
CUSTOMER GROUP'S DECLARATIONS AND WITNESS AND EXHIBIT LIST**

PLEASE TAKE NOTICE that, the undersigned hereby certifies that, as of the date hereof, counsel for Lone Star Solar, LLC,² Idaho Power Company, West Warwick Energy Storage 1, LLC, West Warwick Energy Storage 2, LLC, and West Warwick Energy Storage 3, LLC³ (each a “*Customer*,” and collectively, the “*Ad Hoc Customer Group*”), each a creditor, customer, and party in interest, has received no answer, objection, or other responsive pleading to the *Motion for Entry of an Order Authorizing Ad Hoc Customer Group to Redact and File Under Seal Confidential Information Contained in Exhibits in Connection with Ad Hoc Customer Group's Declarations and Witness and Exhibit List* [Docket No. 339] (the “*Motion to Seal*”).

PLEASE TAKE FURTHER NOTICE that pursuant to the *Order Shortening Time Period for Notice* [Docket No. 344], objections to the Motion to Seal were to be presented orally at the hearing scheduled for July 15, 2025. On July 15, 2025, the Ad Hoc Customer Group filed an adjournment request, which adjourned the hearing date on the Motion to Seal to August 6, 2025. Rule 9013-2 of the Local Bankruptcy Rules for the District of New Jersey provides that any opposition to a motion must be filed and served not later than seven (7) days before the hearing date. The undersigned further certifies that the Ad Hoc Customer Group's counsel has caused a review of the Court's docket in the above captioned chapter 11 cases and that no response, objection or other responsive pleading to the Motion to Seal appears thereon.

² Lone Star Solar, LLC is a subsidiary of energyRe, LLC.

³ West Warwick Energy Storage 1, LLC, West Warwick Energy Storage 2, LLC, and West Warwick Energy Storage 3, LLC are direct subsidiaries of Convergent West Warwick, LLC and indirect subsidiaries of Convergent Energy and Power LP.

PLEASE TAKE FURTHER NOTICE that a clean version of the proposed order approving the relief requested in the Motion to Seal on a final basis (the “***Proposed Final Order***”) is attached hereto as Exhibit A. A redline comparing the Proposed Final Order to the proposed order originally submitted with the Motion to Seal is attached hereto as Exhibit B. The Ad Hoc Customer Group respectfully requests that the Court enter the Proposed Final Order.

Dated: August 5, 2025

New York, NY

/s/ Steven M. Abramowitz

VINSON & ELKINS LLP

Steven M. Abramowitz (NJ Bar No. 043641990)

David S. Meyer (admitted *pro hac vice*)

Lauren R. Kanzer (admitted *pro hac vice*)

The Grace Building

1114 Avenue of the Americas, 32nd Floor

New York, New York 10036-7708

Tel: (212) 237-0000

Fax: (212) 237-0100

Email: sabramowitz@velaw.com

dmeyer@velaw.com

lkanner@velaw.com

-and-

William L. Wallander (admitted *pro hac vice*)

Matthew D. Struble (admitted *pro hac vice*)

2001 Ross Avenue, Suite 3900

Dallas, Texas 75201

Tel: (214) 220-7700

Fax: (214) 220-7716

Email: bwallander@velaw.com

mstruble@velaw.com

*Counsel for Ad Hoc Group of
Customers of Powin, LLC*